



September 22, 2009

Sent via facsimile to (916) 327-5621 and electronically on www.arb.ca.gov

Mary Nichols, Chair  
Members of the Board  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

**Re: Agenda Item 09-8-5: Public Meeting to present ARB's Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions**

Dear Chair Nichols and Board Members:

The Inland Empire Chapter of NAIOP, the Commercial Real Estate Development Association, values the opportunity to comment on the ARB staff's Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions being presented to the ARB Board Members on the September 25<sup>th</sup>.

NAIOP is the leading organization for developers, owners and related professionals in office, industrial and mixed-use real estate. The Inland Empire Chapter covering the Southern California regions of Riverside and San Bernardino Counties. As such, NAIOP Inland Empire agrees ARB's preferred approach should be pursuing an incentive program to maximize the emissions efficiency benefits of rail transportation.

CARB has had significant success with past incentive programs and enforceable agreements with the railroads and other international trade emissions sources. For example, ARB's staff has estimated that federal standards and state regulations of other rail yard sources (e.g. cargo handling equipment), as well other agreements with the railroads will result in diesel PM emissions reductions of "about one-third by 2010, about half by 2015, and about two-thirds by 2020" (Recommendations, pg. 5). Additionally, ARB states existing projections may overestimate growth in the next 5-10 years given the current recession, resulting in dramatically lowered emissions for the foreseeable future. As ARB Staff points out on page ES-3 of their Recommendations, pursuing the incentive program will

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allow ARB to achieve their goal of reducing DPM from goods movement sources 85% by 2020.

International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. Railroads and other industries have experienced a 20-30% reduction in California business activities in this recession. Rail is the most environmentally sound way to move goods over land and is a key component of the goods movement system in California and across the nation. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

Robert Evans  
Executive Director

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